



PERSONAL DATA PROCESSING

Controller	Kia Slovakia s. r. o. Sv. Jána Nepomuckého 1282/1, 013 01 Teplička nad Váhom Business ID No: 35 876 832 Company registered the in Business Register of the District Court Žilina, Section Sro, Insert No: 15074/L
Web	https://www.kia.sk/en/personal-data-protection
Data Protection Officer	Employee of the Compliance and Internal Audit Section (compliance), who can be contacted in person at the address of the Kia (Administrative building, 2nd floor), by sending an e-mail to podnet@kia.sk or by phone at 00421 41 515 5555.

Legal regulations in the field of personal data protection

- Regulation (EU) 2016/679 of the European parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to only as "GDPR")
- Act no. 18/2018 Coll. on the Protection of Personal Data and on amendment of certain acts (hereinafter referred to only as "Act")

Purposes, legal bases of processing and retention period of personal data

Kia processes personal data (obtained directly from the data subjects or through intermediaries, from publicly available sources or from third parties) in accordance with pre-defined processing intentions linked to various operations within each individual processes. Each purpose has an adequate legal basis to guarantee the lawfulness of the processing. Different types of legal bases are applied for Kia processing operations, depending on their suitability for the purpose, but it is in particular compliance with a legal obligation (the retention period is determined by law and the person concerned is obliged to provide personal data in this case), existence of Kia's legitimate interests (retention period is determined by the duration of legitimate interests and by the period during which claims of legitimate interest can be asserted), data subject`s consent (the retention period is determined by the time for which the consent was granted, or it is terminated by the moment of withdrawal of the consent), fulfilment of the contract



to which the data subject is a party or fulfilment of the contract in the framework of pre-contractual relations (retention period is determined by the time of pre-contractual negotiations and the period of the contract performance), including the period during which claims under the contract may be asserted; the provision of personal data may be voluntary in this case, except where the provision of data is necessary for the contract fulfilment.

Recipients of the personal data

Kia makes personal data available in particular:

- a) public authorities (state administration and self-government bodies, law enforcement bodies and courts, notarial and executory offices, or other public law entities and institutions),
- b) social insurance and health insurance companies, supplementary pension savings and pension management companies, postal companies, banks and insurance companies,
- c) Kia contract partners (suppliers of goods and services, intermediaries processing personal data on behalf of Kia or contractual partners, those on whose behalf Kia processes personal data,
- d) Kia Slovakia Foundation,
- e) employee representatives,
- f) medias and news agencies,
- g) other authorities, non-legal or legal persons, within the framework defined by the relevant legal basis.

Transfer of personal data to third countries

Kia does not transfer any personal data of the data subject to third countries outside the European Union. If there are valid reasons for such a transfer of personal data, Kia will do so solely on the basis of the conditions set out in GDPR legal framework or the Act.

Automated decision making and profiling

Kia does not make decisions based on the automated processing of personal data, including profiling.



Rights of the Data Subjects

Right of access

The data subject has the right to be informed whether the personal data concerning him/ her are being processed and, if so, he/she has the right to access his/her personal data. The data subject has the right to be provided with copies of the personal data that Kia processes about him/ her as well as with information on how personal data is processed. Kia provides these information in a form that reflects the form of the data subject request or required method of provision. Kia is entitled to charge a reasonable fee corresponding to the administrative costs in case of repeated requests from data subject if he/she repeatedly requests personal data to the same extent.

Right to rectification

Kia is only entitled to process correct and up-to-date personal data, so it is in its interest for the data subject to report of processing of incomplete, incorrect or inaccurate data and to request a correction. Based on the right to correct the processed data, Kia will complete or correct incorrect personal data without undue delay.

Right to erasure

The data subject has the right to demand deleting of all data that are being processed illegally (e.g. the data subject has withdrawn his consent to the data processing and there is no other legal basis of processing).

Right to restriction of processing

The data subject has the right to restrict data processing if the right of rectification has been applied or if he/she objects to the personal data erasure, if their processing is illegal or Kia no longer needs these personal data for processing but the data subject needs the data to prove, assert or defend legal claims. In such cases, Kia will limit the processing of personal data to the time strictly necessary.



Right to data portability

The data subject has the right to obtain and request Kia to transfer personal data provided by him/her to another controller in a structured, commonly used and readable format, but only in the case of data processed on a legal basis, with the consent of the data subject or on the basis of a contract to which the data subject is a party.

Right to object

The data subject is entitled to object personal data processing if he/she considers that it is unjustified or he/she requires to reconsider profiling or result of automated decision-making. Kia may not further process personal data unless it proves the necessary legitimate interests for data processing which outweigh the interests, rights and freedoms of the data subject, or the reasons for proving, asserting or defending legal claims.

Right to withdraw consent

In case of data processing based on the data subject's consent, data subject has the right to revoke the consent at any time by sending it to e-mail podnet@kia.sk or in person at Kia's registered office, Compliance and internal audit section. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right to file a complaint

The data subject may enforce his/her rights and address to Kia any comments or complaints regarding the processing of his/her personal data, by sending an e-mail to podnet@kia.sk or in writing at the address of Kia's registered seat or in person at the Kia's registered office, while he/her also has the right to file a complaint with the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27, which is the supervisory authority.



Information on Purposes, Legal Bases of the Data Processing and Personal Data and Data Subjects Categories

Purpose	Legal Basis	Personal Data Category	Data Subjects Category
Foreign workers employment	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the purposes of legitimate interests pursued by Kia. Art. 9 sec. 2 lit. b), f), h), i) GDPR.	Regular personal data Sensitive personal data Personal data relating to criminal convictions and offences	Foreign workers Family relatives of foreign workers
Occupational Health and Safety	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the purposes of legitimate interests pursued by Kia. Art. 9 sec. 2 lit. b), f), h), i) GDPR.	Regular personal data Sensitive personal data (Health data, pandemic)	Kia Employees Other persons working at Kia premises
Administration of Kia personnel agenda	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the performance of contract or to take steps prior to entering into contract. Art. 9 sec. 2 lit. b), f), h), i) GDPR.	Regular personal data Sensitive personal data (Health data, Trade Union Board membership) Personal data relating to criminal convictions and offences	Kia Employees Family relatives and Close persons of Kia Employees Job applicants applying for specific vacant position Persons with agreements of work performed outside employment relationship Former Kia Employees
Business Trips	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Kia Employees Business Travelers
Kia Social Policy	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the purposes of legitimate interests pursued by Kia. Processing is necessary for the performance of contract or to take steps prior to entering into contract. Art. 9 sec. 2 lit. b), f), h), i) GDPR.	Regular personal data Sensitive personal data (Health data)	Kia Employees Family relatives and Close persons of Kia Employees Former Kia Employees



Purpose	Legal Basis	Personal Data Category	Data Subjects Category
Processing salary of persons working for Kia based on the employment contract, agreement on work performed outside employment relationship and employees of the temporary employment agency including salary acknowledgement receipt	Compliance with a legal obligation to which Kia is subject. Art. 9 sec. 2 lit. b), f) GDPR.	Regular personal data Sensitive personal data (Health data)	Kia Employees Family relatives and Close persons of Kia Employees Former Kia Employees Job applicants Persons with agreements of work performed outside employment relationship
Collective employment relationships	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the performance of contract or to take steps prior to entering into contract. Art. 9 sec. 2 lit. b), f), h), i) GDPR.	Regular personal data Sensitive personal data (Health data)	Kia Employees
Education of Employees	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the purposes of legitimate interests pursued by Kia. Processing is necessary for the performance of contract or to take steps prior to entering into contract.	Regular personal data	Kia Employees
Dual Education	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the performance of contract or to take steps prior to entering into contract. Processing is necessary for the purposes of legitimate interests pursued by Kia. Art. 9 sec. 2 lit. b), f) GDPR.	Regular personal data Sensitive personal data (Health data)	Students, Vocational training supervisors for dual education program
Diploma Works and Theses, Vocational Education and Trainings and Scholarship program	Processing is necessary for the performance of contract or to take steps prior to entering into contract. Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Students
Administration of candidate database	Data Subject has given consent to the processing.	Regular personal data	Job applicants
Candidates for employment (specific vacant position offer)	Processing is necessary for the performance of contract or to take steps prior to entering into contract.	Regular personal data	Job applicants Kia Employees



Purpose	Legal Basis	Personal Data Category	Data Subjects Category
Candidate / Kia internal employee evaluation	Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Job applicants Kia Employees
Kia Internal Fleet management	Processing is necessary for the performance of contract or to take steps prior to entering into contract. Processing is necessary for the purposes of legitimate interests pursued by Kia (Vehicle distribution, service repairs, insurance in case of damage or destruction, sales). Art. 9 sec. 2 lit. f) GDPR.	Regular personal data Sensitive personal data Personal data relating to criminal convictions and offences	Kia Employees
Competitions and Events organization including relevant records	Processing is necessary for the purposes of legitimate interests pursued by Kia. Data Subject has given consent to the processing (family relative). Art. 9 sec. 2 lit. a) GDPR.	Regular personal data Sensitive personal data (Health data)	Kia Employees Family relatives of Kia Employees Other data subjects applying for internal event or participating in competition
Security and Property protection	Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Persons entering Kia premises
Camera Monitoring System to improve security of Kia property, to increase health safety and security, to receive proof evidence for potential legal proceedings and to control obedience of work discipline.	Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Persons entering Kia premises
Administration of Registry	Compliance with a legal obligation to which Kia is subject. Art. 9 sec. 2 lit. f) and j) GDPR.	Regular personal data Sensitive personal data	Mailers and recipients of the official correspondence Kia Employees Kia Employees Family relatives of Kia Employees Former Kia Employees Job applicants applying for specific vacant position Persons with agreements of work performed outside employment relationship



Purpose	Legal Basis	Personal Data Category	Data Subjects Category
Administration of accounting documents	Compliance with a legal obligation to which Kia is subject.	Regular personal data	Kia Employees Personal data included in the invoices or other accounting bills
Internal processes management (technical, organization and production) and reporting	Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Kia Employees Other persons participating in the internal Kia processes
Operation of IT systems	Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Kia Employees
Data processing related to contractual and pre-contractual relationships	Processing is necessary for the purposes of legitimate interests pursued by Kia. Processing is necessary for the performance of contract or to take steps prior to entering into contract. (Business partner - natural person).	Regular personal data	Employees and other persons related to Kia Business Partners Employees and other persons related to Kia Business Partners with which Kia intends to enter into contractual relationship
Kia property selling	Processing is necessary for the performance of contract or to take steps prior to entering into contract.	Regular personal data	Potential buyers of Kia property
Litigation and dispute management	Processing is necessary for the performance of contract or to take steps prior to entering into contract. Art. 9 sec. 2 lit. f) GDPR.	Regular personal data Sensitive personal data Personal data relating to criminal convictions and offences	Persons in a legal dispute or in the other proceeding against Kia (or persons on behalf of whom is Kia in a legal dispute or in the other proceeding against some other party)
Administration of requests for provision of assistance	Compliance with a legal obligation to which Kia is subject. (Public Authorities, Law Enforcement, Courts and other authorized entities). Processing is necessary for the purposes of legitimate interests pursued by Kia. Art. 9 sec. 2 lit. f) GDPR.	Regular personal data Sensitive personal data	Persons in employment, business or other contractual relationship with Kia
Data processing related to the volunteering (communication of organizational instructions)	Processing is necessary for the performance of contract or to take steps prior to entering into contract.	Regular personal data	Kia Employees



Purpose	Legal Basis	Personal Data Category	Data Subjects Category
Communication and presentation Kia in the internal and external media ("PR agenda")	Processing is necessary for the purposes of legitimate interests pursued by Kia. Data Subject has given consent to the processing (Photos).	Regular personal data	Personal data included in photo, video and sound records
Compliance and Whistleblowing	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the purposes of legitimate interests pursued by Kia. Art. 9 sec. 2 lit. f) GDPR	Regular personal data Sensitive personal data	Personal data of whistleblowers or other persons included in the report related to anti-social activities
Data subjects rights application	Compliance with a legal obligation to which Kia is subject. Processing is necessary for the purposes of legitimate interests pursued by Kia. Art. 9 sec. 2 lit. f) GDPR.	Regular personal data	Data subjects applying their rights
Internal Audits	Processing is necessary for the purposes of legitimate interests pursued by Kia.	Regular personal data	Kia Employees Persons participating in Kia business or other contractual relationships